

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Janet Fitzgerald and John Fitzgerald, h/w
1908 Lillian Drive
Williamstown, New Jersey 08094

Plaintiffs

VS.

Federal Express Corporation
c/o CT Corporation System
1635 Market Street
Philadelphia, PA 19103

Defendant

CIVIL ACTION

NO: 02-4762

**PLAINTIFF'S SELF-EXECUTING DISCLOSURE
PURSUANT TO F.R.C.P. 26**

A. Name and Last Known Address of Each Person Reasonably Likely to Have Information That Bears Significantly on the Claims and Defenses, Identifying the Subjects of the Information.

Janet M. Fitzgerald
1908 Lillian Drive
Williamstown, NJ 08094

(Mrs. Fitzgerald has information about her accident, her injuries and damages)

John R. Fitzgerald
1908 Lillian Drive
Williamstown, NJ 08094

(Mr. Fitzgerald has information about Janet Fitzgerald's injuries and damages)

John Fitzgerald (son)
1908 Lillian Drive
Williamstown, NJ 08094

(Mr. Fitzgerald has information about the accident, Janet Fitzgerald's injuries and damages)

Jenna Fitzgerald (daughter)
1908 Lillian Drive
Williamstown, NJ 08094

(Ms. Fitzgerald has information about Janet Fitzgerald's injuries and damages)

John Senick
Mall Security, Deptford Mall
Deptford, NJ
(Plaintiffs believe Mr. Senick may have information concerning the accident and Janet Fitzgerald's injuries and damages)

Steve Buono
Principle - Orchard Valley Middle School
Washington Township, Seawell, NJ
(Mr. Bono may have information about Mrs. Janet Fitzgerald's injuries and damages.)

Nicholas L. DePace, M.D.
2422-24 South Broad Street
Philadelphia, PA 19145
(Dr. DePace may have information about Mrs. Janet Fitzgerald's injuries and damages.)

Paul J. DeMuzio, M.D.
Jefferson Vascular Surgery Associates
111 South 11th Street, STE G- 6350
Philadelphia, PA 19107
(Dr. DeMuzio may have information about Mrs. Janet Fitzgerald's injuries and damages.)

Mitchell K. Freedman, D.O.
Rothman Institute Orthopaedics
925 Chestnut Street
Philadelphia, PA 19107
(Dr. Freedman may have information about Mrs. Janet Fitzgerald's injuries and damages.)

John P. Kohler, M.D.
301 City Avenue, Suite 250
Bala Cynwyd, PA 19004
(Dr. Kohler may have information about Mrs. Janet Fitzgerald's injuries and damages.)

Eric Kuger, M.D.
Wenonah Medical Associates
107 E. Mantua Avenue
Wenonah, NJ 08090
(Dr. Kuger may have information about Mrs. Janet Fitzgerald's injuries and damages.)

Steven Mandel, M.D.
Neurology and Neurophysiology Associates, P.C.
Sheridan Building
125 South Ninth Street, Suite 200

Philadelphia, PA 19148

(Dr. Mandel may have information about Mrs. Janet Fitzgerald's injuries and damages.)

Peter Vitanzo, M.D.

Rothman Institute Orthopaedics

925 Chestnut Street

Philadelphia, PA 19107

(Dr. Vitanzo may have information about Mrs. Janet Fitzgerald's injuries and damages.)

Plaintiffs also believe an as yet unidentified employee of defendant Federal Express, who was involved in the accident that is the subject of this action, may have knowledge concerning the accident.

Discovery is just beginning, and plaintiffs reserve the right to supplement this response, either through a formal supplemental response or through discovery responses.

B. General Description, Including Location, of All Documents, Data, Compilations, and Tangible Things in the Possession, Custody, or Control of Plaintiff That Are Likely to Bear Significantly on the Claims and Defenses.

Medical records of Underwood Memorial Hospital, pertaining to Janet M. Fitzgerald;

Medical records of Booth Radiology, pertaining to Janet M. Fitzgerald;

Medical records of Nicholas L. DePace, M.D., pertaining to Janet M. Fitzgerald;

Medical records of Paul J. DiMuzio, M.D., pertaining to Janet M. Fitzgerald;

Medical records of Mitchell K. Freedman, D.O., pertaining to Janet M. Fitzgerald;

Medical records of John P. Kohler, M.D., pertaining to Janet M. Fitzgerald;

Medical records of Steven Mandel, M.D. , pertaining to Janet M. Fitzgerald;

Medical records of Peter C. Vitanzo, M.D., pertaining to Janet M. Fitzgerald;

Medical records of RS Medical, pertaining to Janet M. Fitzgerald;

Photographs of accident scene prepared by counsel;

Schedule of Medical Expenses prepared by counsel.

Except where otherwise noted, copies of the documents listed above are in the possession of plaintiff's counsel.

Discovery is just beginning, and plaintiffs reserve the right to supplement this response, either through a formal supplemental response or through discovery responses

C. The Existence and Content of Any Insurance Agreement under which Any Person or Entity Carrying on an Insurance Business May Be Liable to Satisfy Part or All of the Judgment that May Be Entered in the Action, or Indemnify or Reimburse for Payments made to Satisfy the Judgment, Making Available Such Agreement for Inspection and Copying as under Local Civil Rule 26.1.

Other than any liability insurance covering defendant's liability and to the extent responsive, plaintiff's health insurance, none.

THEODORE J. CALDWELL, JR.
Identification Number: 49487
Litvin, Blumberg, Matusow & Young
The Widener Building - 18th Floor
1339 Chestnut Street
Philadelphia, Pa 19107
(215) 557-3316
Attorneys for Plaintiffs